ALAAmericanLibraryAssociation

November 15, 2013

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

RE: WC Docket No. 13-184

Dear Secretary Dortch:

On November 13, 2013, Alan Inouye, Director, Office for Information Technology Policy (OITP), American Library Association (ALA); Larra Clark, Director, Program on Networks OITP; Marijke Visser, Assistant Director, OITP; and Alan Fishel, Partner, Arent Fox LLP met with the following: Trent Harkrader, deputy chief WCB; Anne Levine, Office of Strategic Planning (OSP); Michael Steffen, FCC Director of Digital Learning; Lisa Hone, deputy chief TAPD; and Cara Voth, Mark Nadel, Chas Eberle, Soumitra Das, Mark Walker, Adrian Wright, Dana Bradford, Dania Ayoubi and James Bachtell (TAPD) to discuss ALA's reply comments filed in the Modernizing the E-rate Program for Schools and Libraries proceeding.

During the meeting ALA discussed the multi-faceted roles libraries have in supporting K12 education and non-traditional students such as the 1.5 million homeschooled students, students pursuing a GED, and students involved in distance learning. ALA also highlighted library services that require reliable high-capacity broadband.

ALA shared a short hand method for talking about the breadth and depth of services libraries provide. SEALIGHTS encapsulates the variety of critical services including: Schoolwork and sustained lifelong learning; Employment and economic development resources; Access to technology, digital content & trained librarians; Literacies of all kinds supported by library staff; Innovation and inspiration; Government resources and services—increasingly online only; Health and wellness information; Training and teaching; and Social connection—including seniors and those with special needs.

ALA responded to questions about the two-pronged proposals to increase broadband capacity in libraries where there is currently limited or no availability (ConnectUS) and also for libraries where there is access but other hurdles prevent libraries from securing broadband speeds that are required for modern library services (FINAL). To further clarify, ConnectUS is a short-term program

focused on building fiber connections to libraries (and schools) to connect libraries that lag behind the connectivity curve. FINAL may be implemented as a pilot program that is modeled after the current E-rate program but that targets libraries that are currently at modest speeds (10 Mbps, for example) and that need significantly higher speeds to be able to fully serve their communities. The FINAL program would modify some of the existing E-rate rules so that applicants for FINAL could receive funding that allows for a whole network approach so that a library could fully design and implement a network that allows for such a significant connectivity increase. As stated in our initial comments, the FINAL program would preference applications that demonstrate partner funding for the expenses not covered under the E-rate program, facilitated through other rule modifications as feasible. Partners include private foundations, government agencies, and corporate and private philanthropy. Additionally, targeted libraries may need additional technology support services to fully benefit from the FINAL program and ALA suggests that USAC work with appropriate state level library agencies (or other appropriate entities) to provide necessary services.

Both ConnectUS and FINAL are predicted on an additional short-term infusion of funding and are designed to be administered outside of the current E-rate program.

Other questions related to library-specific data. ALA discussed available library technology data and recently developed public library technology benchmarks. First, ALA shared data from the Public Library Funding & Technology Access Study released in June 2012 that includes maximum Internet access speeds, whether or not bandwidth management is used, provision of public wireless access, number of public access computers provided by libraries and digital services enabled through this technology infrastructure. A new public library survey—the Digital Inclusion Survey—currently is in the field that will capture many of these indicators and will provide data by June 2014. Information on the surveys is available through the ALA Office for Research and Statistics (http://www.ala.org/research/initiatives/plftas and http://www.ala.org/research/digitalinclusion). Data on computers and computer use also is available through the Institute of Museum and Library Services (IMLS). FCC staff asked if ALA also had any cost or pricing data (e.g., related to the costs of wireless access points for libraries), but ALA is

The ALA Office for Information Technology Policy also is one of nearly a dozen collaborators on the Edge Initiative, which includes public access technology benchmarks and a range of tools to support libraries in leveraging technology and engaging stakeholders to achieve local community priorities. The benchmarks include ensuring libraries have sufficient devices and bandwidth to accommodate user demand, and libraries manage their technology resources to maximize quality. The Edge benchmark recommends 1Mbps download of bandwidth capacity per library-owned device to meet user demand *today*. Bandwidth goals for 2015 and beyond should certainly aim significantly higher.

unaware of any national data in this regard. ALA is seeking anecdotal examples that may be

In addition, ALA reiterated its concerns that rural libraries have numerous challenges in securing the broadband speeds they need. These include the high costs of services, difficulty eliciting more than one bid for services, and challenges ascertaining that the prices offered are in fact the lowest corresponding prices. ALA reiterated its call to use locale codes from IMLS to identify rural

illustrative.

libraries. We also recommend adding "town, remote" and "town, distant" to the rural areas for the purpose of the E-rate program to ensure adequate support to libraries in truly rural areas and communities distant from urban cores. IMLS recently published a research brief on rural and small libraries, which is available at

http://www.imls.gov/assets/1/AssetManager/Brief2013_05.pdf.

Other specifics mentioned included reducing the burden on consortia applications during the review process and developing an analogous discount matrix to school applicants for library applicants, and the nature of wireless use by libraries outside of the library building.

If you have any questions or need additional information, please do not hesitate to contact me.

Respectfully submitted,

Marijke Visser

Assistant Director,

Office for Information Technology Policy

American Library Association

Maybe Um

Washington Office

1615 New Hampshire Avenue NW

Washington, DC 20009